

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TRANSNATIONAL MANAGEMENT :
SYSTEMS II, LLC, :

Plaintiff, :

-against-

14 Civ. 02151 (AT) (HBP)

**DECLARATION OF
SANDRA GALE BEHRLE**

ANTHONY CARCIONE, BIZ JET
CONSULTANTS, LLC, TIM PRERO, and :
PEGASUS ELITE AVIATION, INC., :

Defendants. :

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1. I am the principal of the Law Offices of Sandra Gale Behrle, counsel for defendants Anthony Carcione and Biz Jet Consultants, LLC. ("Biz Jet"). I make this Declaration on my own knowledge in support of the Biz Jet defendants' request for an award of attorneys fees. We respectfully refer to the declaration of our co-counsel Brendan Collins, filed on December 29, 2016 ("Collins Decl.").

2. I am admitted to practice and in good standing in the State of New York, First Department, May 6, 1974. Since admission I have maintained an office for the practice of law in New York City.

3. After graduating cum laude from Fordham University School of law, I worked at Barrett, Smith Shapiro & Simon. I moved to Austrian, Lance & Stewart, and then created Cooper, Brown & Behrle, P.C. I now operate out of the Law Offices of Sandra Gale Behrle.

4. I have had a relationship with the attorneys at GKG Law, P.C., a Washington D.C. based law firm, for over thirty-five (35) years. I have frequently represented GKG clients when cases have brought them to New York.

5. As with all other cases, in this case, I reviewed the facts, pleadings and necessary filings. We refer to the Exhibits submitted with the Collins Decl. I attended every court session, and regularly conferred with Mr. Collins on documentation and strategy.

6. My hourly rates of \$350.00 are more than reasonable in accordance with local practices. The time spent was necessary and limited in accordance with New York rates and practices.

7. We submit this Declaration in support of the Biz Jet defendants' request for an order awarding their reasonable attorneys' fees in the total amount of \$140,132.50, including those incurred by the Law Offices of Sandra Gale Behrle in the amount of \$12,253.55.

Pursuant to the provision of 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: December 30, 2016
New York, New York


Sandra Gale Behrle